

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

TAMMIE SEBASTIAN,)	CASE NO.: 1:19-CV-02650
)	
Plaintiff,)	JUDGE: CHRISTOPHER A. BOYKO
)	
v.)	PARTIES' JOINT NOTICE OF
)	SETTLEMENT AND MOTION
PARMA CITY SCHOOL DISTRICT)	FOR ENLARGEMENT OF TIME TO
BOARD OF EDUCATION, et al.,)	SUBMIT DISMISSAL ENTRY OR FOR
)	DEFENDANTS TO MOVE, PLEAD OR
Defendants.)	OTHERWISE RESPOND TO
)	PLAINTIFF'S COMPLAINT

Now comes Plaintiff Tammie Sebastian (“Plaintiff”) and Defendants Parma City School District Board of Education, Parma City School District, Audrey Holtzman and Charles Smialek (“Defendants”), by and through counsel, to hereby jointly notify the Court that they have reached a settlement in principal in this matter. As a result, Plaintiff and Defendants jointly seek an additional thirty calendar days from February 3, 2020 (Defendants’ original Answer date), or until March 4, 2020, for them to effectuate a written settlement agreement and submit the appropriate dismissal entry with the Court. In the unlikely event that a written settlement agreement is not effectuated within this timeframe, then the Defendants will move, plead or otherwise respond to Plaintiff’s Complaint by March 4, 2020. Plaintiff and Defendants do not bring this notice and motion for purposes of unnecessary delay, but rather only to provide them enough time to effectuate settlement and remove this case from the Court’s docket without imposing an additional burden on the Court’s time and resources.

In view of the foregoing, Plaintiff and Defendants jointly and respectfully request that this Honorable Court grant them an extension of time of thirty (30) calendar days through and including March 4, 2020, within which to file the appropriate dismissal entry, or in the unlikely event a

written settlement agreement is not effectuated, for Defendants to move, plead or otherwise respond to Plaintiff's Complaint.

Respectfully submitted,

BRINDZA MCINTYRE & SEED LLP

s/*David A. Rose*

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Respectfully submitted,

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Counsel for Plaintiff, Tammie Sebastian

CERTIFICATE OF SERVICE

I hereby certify that on January 27, 2020, a copy of the foregoing *Parties' Joint Notice of Settlement and Motion for Enlargement of Time to Submit Dismissal Entry or for Defendants to Move, Plead or Otherwise Respond to Plaintiff's Complaint* was filed electronically. Notice of this filing will be sent to all registered parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

s/*David A. Rose*

DAVID A. ROSE (0073201)

Counsel for Defendants Parma City School District Board of Education, Parma City School District, Audrey Holtzman and Charles Smialek